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17 *Attorneys for the Government of Guam*
18 *and Felix P. Camacho, Governor of Guam*

19
20 IN THE UNITED STATES DISTRICT COURT
21 DISTRICT OF GUAM

22 JULIE BABAUTA SANTOS, et. al.,
23
24 Petitioners,

25 -v-

26 FELIX P. CAMACHO, etc., et. al.
27
28 Respondents.

CIVIL CASE NO. 04-00006
(Consolidated with Civil Case Nos.
04-00038 and 04-00049)

**THE GOVERNOR AND
GOVERNMENT OF GUAM'S
MOTION FOR LEAVE TO FILE
REPLY IN SUPPORT OF MOTION
FOR FINAL APPROVAL OF
SETTLEMENT AND RESPONSE TO
SIMPÃO PLAINTIFFS' OBJECTIONS
IN EXCESS OF TWENTY PAGES**

[No Oral Argument Requested]

FILED

DISTRICT COURT OF GUAM

JUL 26 2007 *mlm*

MARY L.M. MORAN
CLERK OF COURT

ORIGINAL

1 **MOTION FOR LEAVE TO EXCEED TWENTY PAGES**

2 Respondents the Governor and the Government of Guam, through their counsel, Calvo &
3 Clark, LLP, respectfully moves this Court for leave to file The Governor and Government of
4 Guam's Reply in Support of Motion for Final Approval of Settlement and Response to *Simpao*
5 Plaintiffs' Objections, pursuant to District Court of Guam Local Court Rule LR 7.1(g). This
6 motion is supported by the following Memorandum of Points and Authorities, the documents and
7 pleadings on file, and such other further evidence as would please the Court to allow for
8 submission.

9 **MEMORANDUM OF POINTS AND AUTHORITIES**

10 Defendant respectfully seeks permission to file with this Court a memorandum not to
11 exceed 35 pages in length in reply in support of the Governor's and the Government of Guam's
12 motion for final settlement approval and in response to *Simpao* Plaintiffs' objections.
13 Respondents' memorandum must cover issues of notice, claim value, fairness and compliance
14 with the Organic Act. Given these issues and the complex nature of this case, Respondents
15 submit that a memorandum of this length is necessary to fully address the issues raised in
16 opposition to the motion and the objections raised by the *Simpao* plaintiffs.

17 Dated this 26th day of July, 2007.

18 OFFICE OF THE GOVERNOR OF GUAM
19 CALVO & CLARK, LLP
20 Attorneys at Law
21 Attorneys for the Government of Guam
22 and Felix D. Camacho, Governor of Guam

23 By: 

24 DANIEL M. BENJAMIN